

April 21, 2015

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captioningexemptionfcc.gov

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
9300 East Hampton Drive
Capitol Heights, Maryland 20743

*Re: Case Identifier: CGB-CC-1356
CG Docket No. 13-318
Petition for Exemption from Closed Captioning Requirements for Video
Programing Delivered Using Internet Protocol*

Dear Ms. Dortch:

Pursuant to the letter of March 31, 2015, from Suzy Rosen Singleton ("Request for Supplemental Information"), Interconnect Media Network Systems, LLC ("IMN") hereby files this supplement to its petition for a full exemption to the requirements of the Federal Communications Commission ("FCC") regarding closed captioning requirements for Video Programing Delivered Using Internet Protocol.

The Request for Supplemental Information asks for information about the response from program sources to IMN's request for captioning information. The content providers of our primary VOD library were unable to determine if the captioning had been shown on television with captioning in the past. We performed extensive research to obtain this information as well and could find no source to determine whether captioning had been shown. We then decided to obtain a quote for 100 of our most popular titles in order to determine the approximate cost of captioning, and we would fill in any gaps if we were notified by a user or user delegate that a show was missing captioning.

We were able to determine that a few of our programs are exempt, including all content on LCN (C3), and our Deet and the Geek programming. We found that although this programming was shown on television, the providers were not required to provide captioning due to financial eligibility. Our live Vivicast channels were also exempt (Men7, WWX, Sportskool and Freckle) as they had never been shown on television with captions, as well as One World Sports since it originated outside the United States. Our primary focus then turned to Blue Wave Media, the content provider for our largest VOD catalogs. In response to our inquiry, this company replied that it is not required to provide closed captioning.

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Thank you very much for your kind consideration of this exemption request. Please do not hesitate to contact me at my telephone number above or at sturner@imnsys.com or (540) 461-1376 if you have any questions, or you may contact our attorney, Eric M. Page, at epage@eckertseamans.com or (804) 788-7771.

I declare under penalty of perjury that the information contained in this submission, as well as the information contained in the submission of February 17, 2015, as supplemented thereafter, is true and correct to the best of my information and belief.

Sincerely,

St Zuo Ceo

Steven Turner, CEO

COMMONWEALTH OF VIRGINIA)
CITY/COUNTY OF Covington / Allegheny) SS:

On this 27 day of April, 2015, personally came before me Steven Turner, and this person acknowledged under oath, to my satisfaction, that:

- (a) This person signed, sealed and delivered the foregoing instrument as the CEO of Interconnect Media Network Systems, LLC; and
- (b) This document was signed and delivered by Interconnect Media Network Systems, LLC as its voluntary act and deed by virtue of authority from its Board of Managers.

Notary Diane Persinger
Notary Public

My commission expires May 31, 2018



NEVA DIANE PERSINGER
NOTARY PUBLIC 7582832
COMMONWEALTH OF VIRGINIA
COMMISSION EXPIRES MAY 31, 2018